IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

ALGANESH REDA d/b/a U AND I FOOD MART,)
Plaintiff,) Docket No. 3:10-cv-01103
v.) Judge Nixon
PEERLESS INDEMNITY INSURANCE, MONTGOMERY INSURANCE COMPANY, LIBERTY MUTUAL GROUP,) Magistrate Judge Knowles)
Defendants)

JOINT PROPOSED CASE MANAGEMENT ORDER

Pursuant to this Court's Order (DE # 17), the parties submit the following joint proposed Case Management Order amending in certain respects the Initial Case Management Order entered by the Court on January 18, 2011 (DE # 8). Specifically, the parties request that this Court amend the Initial Case Management Order in the following respects:

III. SCHEDULE OF PRE-TRIAL PROCEEDINGS

A. Rule 26(a)(1) Disclosure

The parties have completed their Rule 26(a)(1)(A) through (E) disclosures.

B. Trial Date and Final Pre-Trial Conference

This case shall be set for jury trial on March 6, 2013, at 9:00 a.m.

before the Honorable John T. Nixon.

A final pre-trial conference will be held on February 22, 2013, **at 10:00 a.m.** at the U.S. Courthouse in Nashville, Tennessee.

C. Other Pre-Trial and Discovery Matters

All discovery shall be completed on or before **September 30, 2012**.

All written discovery shall be submitted in sufficient time so that the response shall be in hand by **September 30, 2012**.

All discovery related motions shall be filed on or before October 10, 2012.

No motions related to discovery or for a protective order shall be filed until a discovery/protective order dispute conference has taken place, in an effort to resolve the dispute and a jointly signed discovery/protective order dispute statement is submitted setting forth precisely the remaining issues in dispute and the reasons why those issues remain unresolved.

The deadline for filing motions to amend the pleadings shall be on or before **October 10**, **2012**.

The deadline for filing dispositive motions shall be on or before **October 22, 2012**, and any Response thereto shall be filed thirty (30) days after filing the Motion. Any Reply shall be filed on or before ten (10) days after filing the Response.

The response time for all written discovery and Request for Admissions is thirty (30) days, and the penalties for violation thereof are delineated within the Federal Rules of Civil Procedure, as written.

All other deadlines and provisions of the Initial Case Management Order shall remain in full force and effect.

It is so **ORDERED**ENTERED this the ______ day of _________, 2012.

United States Magistrate Judge